

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

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| In re: BRIDGESTONE/FIRESTONE, INC., TIRES PRODUCTS LIABILITY LITIGATION |) Master File No. IP 00-9373-C-B/S) MDL NO. 1373)))) |
| <hr/> THIS DOCUMENT RELATES TO ALL ACTIONS | |

ENTRY FOR NOVEMBER 15, 2002

The parties appeared, by counsel, this date for a telephonic discovery conference, during which the following was discussed:

1. Ford raised the issue of the defendants' desire to obtain certain additional information from plaintiffs' expert Manuel Lasaga. It was determined that the parties will confer with one another further regarding this issue and inform the magistrate judge if they are unable to resolve it.
2. Victor Diaz raised two issues regarding Ford's electronic database. First, there has been a problem with plaintiffs' attorneys' passwords used to access the database being invalidated for no apparent reason. Steve Harburg, counsel for Ford, will work to determine why this has occurred and how it can be avoided in the future. Second, there are numerous documents on the database that are coded as "view only" and therefore cannot be printed. Mr. Harburg will investigate this problem as well and report to plaintiffs' counsel.
3. The parties have agreed upon deadlines for foreign law expert discovery in the *Brzobohaty* case and will submit a proposed order setting forth those deadlines.
4. Firestone will prepare and submit a proposed entry granting its Motion for Extension of

Deadlines in the Non-“First Wave” Foreign Accident Cases which, assuming no plaintiff files an objection, will be entered on November 19, 2002.

5. The issue of whether the defendants are entitled to discover a “tire chart” maintained by plaintiffs’ expert Baumgardner was discussed, and it was determined that the issue needs to be briefed by the parties before it can be resolved.
6. Firestone reports that a group of 86 photographs taken of Explorers by Mr. Baumgardner in Venezuela has been produced to the defendants without any identifying information. Plaintiffs’ counsel reports that Mr. Baumgardner has no identifying information. The defendants may question Mr. Baumgardner regarding the photographs during one of his already-scheduled depositions to determine what, if any, information he has about them.
7. The issue of the Venezuelan plaintiffs’ compliance with the order to provide defendants with executed economic release forms by November 6, 2002, was discussed. Mr. Diaz has fully complied with the order. If the defendants determine that any other plaintiffs’ counsel has not complied, they should contact the counsel in question and, if necessary, raise the issue with the magistrate judge at the next discovery conference.
8. Firestone will send Mr. Diaz another copy of the October 30, 2002, letter regarding problems obtaining Venezuelan medical records, which he has not received, and the parties will confer regarding the issues raised in the letter and inform the magistrate judge if they are unable to resolve any disputes among themselves.

9. The parties shall prepare and submit a proposed order extending the deadline for filing dispositive motions relating to the unavailability of certain causes of action under Venezuelan law in the expedited foreign accident cases.
10. The next telephonic discovery conference will be held on **Tuesday, November 26, 2002, at 1:00 p.m.** Tom Stayton, counsel for Bridgestone, will arrange the call and notify counsel and the magistrate judge of the arrangements. Agendas for the conference shall be exchanged and submitted to the magistrate judge by **4:00 p.m. on November 25, 2002.**

ENTERED this _____ day of November 2002.

V. Sue Shields
United States Magistrate Judge
Southern District of Indiana

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